

**U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

VINCENT AMARA,  
Plaintiff

V.

ANDREY REVERT, AMTRAK and  
CRAWFORD RISK MANAGEMENT  
SERVICE,  
Defendants

**CIVIL ACTION NO. 04-10094 GAO**

## JOINT STATEMENT OF PROPOSED PRE-TRIAL SCHEDULE

Pursuant to this Court's Notice of Scheduling Conference dated May 11, 2004, counsel for all parties in the above-referenced matter have consulted regarding the pre-trial schedule of this matter. Following is their proposed Pre-Trial Schedule:

1. All non-expert discovery, including depositions, shall be completed by October 31, 2004.
2. All expert discovery, including depositions, shall be completed by November 30, 2004.
3. All motions under F.R.C.P. 12, 19 and 20 shall be filed by November 30, 2004.
4. All motions under F.R.C.P. 15 shall be filed by November 30, 2004.
5. All motions under F.R.C.P. 56 shall be filed and by December 31, 2004.


The defendants do not agree to have this case tried by a magistrate judge.

Signed certifications are attached hereto, stating that the parties and their counsel have had the opportunity to discuss a budget for the costs of litigating this claim.

Respectfully submitted,  
Plaintiff, Vincent Amara,  
By his attorneys,

Defendants, Andrey Revert,  
Amtrak and Crawford Risk  
Management Services,  
By their attorneys,

  
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Dated: 7.6.04